RECEIVED

2020 MAR 16 AM 10: 19

IDAHO PUBLIC STILITIES COMMISSION

## VAN VALKENBURGH LAW, PLLC

P.O. Box 531
Boise, Idaho 83701
PHONE (208) 918-1994
FACSIMILE (208) 947-2424
JACK@VANVALKENBURGHLAW.COM

March 10, 2020

Diane M. Hanian Commission Secretary Idaho Public Utilities Commission 11331 W Chinden Blvd, Suite 201-A Boise, ID 83714

Dear Ms. Hanian,

Enclosed please find the original and seven copies of the STOP B2H Coalitions petition to Intervene in CASE NO. IPC-E-19-19 Idaho Power Company's 2019 Integrated Recourse Plan. Could you please confirm the receipt via email of this petition to intervene.

Please send all electronic communication to myself at <u>jack@vanvalkenburghlaw.com</u> and Jim Kreider of the STOP B2H Coalition at <u>jim@stopb2h.org</u>.

Sincerely,

Jack Van Valkenburgh

Attorney at Law

Jack Van Valkenburgh Van Valkenburgh Law, PLLC P.O. Box 531 Boise, ID, 83701 (208) 918-1994 jack@vanvalkenburghlaw.com

RECEIVED
2020 MAR 16 AM IO: 19

IDAHO PUBLIC STILLTIES COMMISSION

Attorney for petitioner STOP B2H Coalition

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER	) CASE NO. IPC-E-19-19
COMPANY'S 2019 INTEGRATED RESOURCE PLAN.	)
	) STOP B2H COALITION PETITION
	) TO INTERVINE

COMES NOW, the STOP B2H COALITION ("STOP" or "Intervenor"), by and through its attorney, Jack Van Valkenburgh and, pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA31.01.01.071-073, hereby petitions the Commission for leave to intervene and to appear and participate as a party, and as grounds therefore states as follows:

- 1) The name and address of the intervener is:
  Jim Kreider
  STOP B2H Coalition
  60366 Marvin Rd
  La Grande, OR 97850
  541-406-0727
  jim@stopb2h.org
- STOP will be represented in this proceeding by: Jack Van Valkenburgh Van Valkenburgh Law, PLLC P.O. Box 531 Boise, ID, 83701 (208) 918-1994 jack@vanvalkenburghlaw.com

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the names and addresses above. Electronic copies are preferred.

3) STOP is a growing alliance of citizen organizations and individuals who are opposed to the 305 mile Boardman to Hemingway ("B2H") 500kv Transmission line. Our purpose is to insure the accuracy of the information presented in support of this facility by all parties involved and provide alternatives to the construction of this 305 mile transmission line through Eastern Oregon and Western Idaho, thereby: fact checking the applicants information; offering alternative ideas and ways of thinking; representing the public of Oregon, specifically Eastern Oregon as we did in 2017 and 2015; protecting environmental, historical and cultural resources; ensuring the health, safety, social, and economic well being of our region, preventing the degradation of agricultural, timber, range and other land assets; promoting energy conservation; and supporting the rapid development of new technologies in energy generation, storage and distribution throughout Eastern Oregon, the Mid - C trading HUB and the country.

- 4) Based on the information provided above in accordance with the Commission's rules of procedure, STOP has a direct and substantial interest in this proceeding and its involvement would not unduly broaden the scope of this proceeding, as filed.
- 5) Thus, if granted intervention in this case, STOP will address a variety of issues of importance to the general body of Idaho Power's ratepayers. STOP respectfully submits that it will serve an important role in this proceeding if given the opportunity to participate as a party.

STOP respectfully requests the right to participate in this proceeding and introduce testimony and exhibits, cross-examine other witnesses, engage in oral argument, file comments, and otherwise fully participate as a party. STOP intends to seek intervenor funding pursuant to IDAPA 31.01.161-165.

WHEREFORE, STOP hereby requests that this Commission grant its Petition to Intervene in this proceeding and to fully appear and participate as a party with all the rights and responsibilities as such.

DATED, this 10th day of March 2020

Respectfully submitted,

Jack Van Valkenburgh

Van Valkenburgh Law, PLLC

Jim Kreider

STOP B2H Coalition

Certificate of Service

I HEREBY CERTIFY that on the 10<sup>th</sup> of March 2020, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

Delivered by post:

Diane Hanian

Commission Secretary (Original and seven copies provided)

Idaho Public Utilities Commission

PO Box 83720

Boise, Idaho 83720-0074

Electronic Mail:

Idaho Power

Lisa D. Nordstrom

Inordstrom@idahopower.com

Tim Tatum

ttatum@idahopower.com

Matthew Larkin

mlarkin@idahopower.com dockets@idahopower.com